

EXHIBIT 105

Declaration of Jordan Peterkin

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
CASE NO. 1:14-CV-954**

**STUDENTS FOR FAIR
ADMISSIONS, INC.,**

Plaintiff,

v.

**UNIVERSITY OF NORTH
CAROLINA et al.,**

Defendants.

DECLARATION OF JORDAN PETERKIN

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I, Jordan Peterkin, hereby make this declaration from my personal knowledge and, if called to testify to these facts, could and would do so competently:

Experience

1. I am an African-American male and a 2017 graduate of The University of North Carolina at Chapel Hill (“UNC-Chapel Hill”).

2. At UNC-Chapel Hill, I was a Business major, an acapella singer with Harmonyx, a photographer for the *Daily Tar Heel*, and the Vice President of the Undergraduate Business Student Association. I also worked with the Diversity and Multicultural Affairs office (“DMA”) and with UNC-Chapel Hill student government.

Diversity at UNC-Chapel Hill

3. When I started at UNC-Chapel Hill in 2013, there were 98 Black males in my class. This included African males and athletes. The Black males from Africa had vastly different experiences from me as an African-American male. Also, athletes have completely different experiences and are not always part of the campus community in the same way due to their busy schedules. Thus, I found that there were only about 40 to 50 students from my entire class who were Black males with similar experiences to me. Out of a class of many thousands, this was a very small number.

4. This small number got even smaller when you broke us up by major. At the Business School, there were only a few Black students, and regularly I was the only Black student in classes. In addition to having only a small number of Black students in

these classes, there were only a few Black faculty members. I felt as though I did not have class members to rely on or faculty members who understood my background.

5. My fellow students and I have voiced concerns about feeling isolated at UNC-Chapel Hill. When we do not have people to compare experiences with, it can lead to many students not wanting to remain at UNC-Chapel Hill. I have had many friends transfer from UNC-Chapel Hill because they felt like they did not fit in. Recruitment and retention of African-American students is a significant issue.

6. As the only Black member in many classes, I was often called out by professors based on my race for my perspective on having a low socioeconomic status and being Black. One experience in particular stands out to me. One professor in the business school had a class in which we discussed the market share of Walmart and how it appealed to lower socioeconomic people and Black and Hispanic people. He asked me to comment on behalf of these people. It was humiliating and alienating.

7. Race is not the only mark of diversity, but race is dynamic and important. Lack of racial diversity is also a disadvantage for White students. They may end up interacting with Black or Hispanic individuals in the real world, but will not know how to relate to them.

8. For instance, there are fifteen or so trillion dollars in buying power in the Black and Latino markets. The American population is becoming more colorful, and our demographics are changing. If students are at a school where they only get to interact with people who look and act like them, and then they enter the business world and many of their customers are different from them, they are at a disadvantage.

9. UNC-Chapel Hill is doing many good things to improve diversity. DMA works to try to get more minority students to apply to UNC-Chapel Hill and to feel welcome when they arrive. UNC-Chapel Hill has established programs and services through their Writing and Learning Centers to help minorities. Chancellor Carol Folt has done an excellent job with Carolina Conversations, which allows for discussion of challenging issues. Black faculty have done a great job creating a shared digital site to engage with one another virtually. It is not perfect, but it is a work in progress.

10. Having diverse classmates helps us all learn from one another. I had a great experience discussing the Black Lives Matter movement in class. My Philosophy professor had just come from Harvard University, and it was his first semester at UNC-Chapel Hill. He was not used to walking past the Chancellor's building and seeing hundreds of people talking about Black Lives Matter. He was intrigued and wanted to talk about it in class. He related it to social biases and existentialism. Students discussed their personal experiences together, talked about fulfillment, and explained how they go through life carrying their own burdens. It was an excellent discussion. The discussion would never have occurred without so many students with different perspectives in class, a professor being open, and a protest happening on campus with students talking about Black Lives Matter. That is the kind of culture you want to cultivate at a university.

Conclusion

11. My experience suggests that we need more, not less, racial diversity at UNC-Chapel Hill. Having more African-American males on campus would help this group feel less isolated and contribute to better recruitment and retention. In addition,

having more minority students would benefit the campus as a whole in an era where students need to learn to interact with other groups and address pressing issues related to race.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on: July 19th, 2017



Jordan Peterkin